

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
)	Criminal No. 20-074-MSM
v.)	
)	
DAVID STAVELEY,)	
Defendant.)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION TO COMPEL RETURN OF DEFENDANT’S PROPERTY**

On December 19, 2022, defendant David Staveley (“Staveley”) moved this Court (ECF #124) to compel the Government to return his personal property that was seized by law enforcement. Staveley previously moved to compel the Government to return his Massachusetts driver’s license to him. That license was subsequently returned to defendant’s mother.

The United States has received the following information from the three law enforcement agencies which may have had possession of defendant’s personal belongings. The FBI reported that it has no personal belongings of the defendant. The United States Marshal’s Service reported that it has five identification cards bearing the defendant’s photograph. These identification cards are in the names of fictitious individuals and are therefore fraudulent and will not be returned to the defendant. The Marshals also have possession of a sixth identification document, a Massachusetts driver’s license in the name of David Sanborn that bears the photograph of another individual. The Government believes this license to be fraudulent as well.

The Massachusetts State Police has reported that it has three personal items in the name of Kurt Sanborn that it wishes to return to the defendant. These consist of a AAA card, a BJ’s card and a Mass Health card. The State Police has attempted to contact defendant’s mother to

return these items but the phone numbers law enforcement has for Mrs. Sanborn do not appear to be working. If defendant supplies his mother's phone number, the United States will request the Massachusetts State Police to make arrangements to return these items to defendant's mother.

Respectfully submitted,

ZACHARY A. CUNHA
UNITED STATES ATTORNEY

LEE H. VILKER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of January 2023, I caused the within Government's Response to be filed electronically and it is available for viewing and downloading from the ECF system. I also certify that this Response has been mailed to:

David Staveley
Reg. No. 04230-049
FMC Devens – Camp
P.O. Box 879
Ayer, MA 01432

/s/ Lee H. Vilker

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